

**To:** CN=Gregory McCabe/OU=R7/O=USEPA/C=US@EPA[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Dan Gravatt/OU=R7/O=USEPA/C=US  
**Sent:** Tue 11/30/2010 10:00:41 PM  
**Subject:** Re: MDNR risk assessor comments on the West Lake Landfill SFS

Thanks for the quick turnaround, Greg!

Daniel R. Gravatt, PG  
US EPA Region 7 SUPR / MOKS  
901 North 5th Street, Kansas City, KS 66101  
Phone (913) 551-7324 Fax (913) 551-7063

**From:** Gregory McCabe/R7/USEPA/US  
**To:** Dan Gravatt/R7/USEPA/US@EPA  
**Cc:** Michael Beringer/R7/USEPA/US@EPA  
**Date:** 11/30/2010 02:34 PM  
**Subject:** Re: MDNR risk assessor comments on the West Lake Landfill SFS

Dan -

I went ahead and looked at the entire attachment. The comments look good. Very thoughtful and detailed. I saw no potential conflicts with our comments. I have a couple of minor observations simply for your information:

Comment 51 - The comment discusses MDNR and EPA screening levels. I have no issues with the discussion. Just as a reminder, when a State is involved as they apparently are at this site, the screening levels should be based on the more protective value; i.e., we review risk assessments for compliance with EPA guidance, but if a State is involved and they want their more protective criteria to be used for screening purposes, that would be acceptable to us.

Comment 124 - This paragraph is a bit confusing to me the way it's written. The important point is that the most protective screening value should be used. Usually, as it does here, that means the screening value based on carcinogenicity should be used. I'm assuming that is what is meant by this comment, even though the focus seems to be primarily on the noncarcinogenic screening value.

Comment 131(e) - In terms of MDNR's concern about the use of the DF term, I believe the newest version of EPA's equations used in its online radionuclide PRG calculator no longer use that specific term for any of the exposure routes. This is largely just a change in terminology, and from a practical standpoint, it has very little, if any effect, on the outcome of the risk assessment.

Bottom line is that I thought they were good comments, and saw nothing that I thought needed changing. Let me know if you have any questions.

Greg

From: Dan Gravatt/R7/USEPA/US  
To: Gregory McCabe/R7/USEPA/US@EPA  
Date: 11/24/2010 09:58 AM  
Subject: MDNR risk assessor comments on the West Lake Landfill SFS

Greg,

MDNR finally sent its final comments on the draft SFS for Westlake, including a section of comments on the risk assessment (Appendix F) which I did not see before they sent their letter. Would you take a quick look at their comments on Appendix F when you have a chance, to see if there are any potential problems with their requested changes or conflicts with our comments on Appendix F?

Thanks,,

Daniel R. Gravatt, PG  
US EPA Region 7 SUPR / MOKS  
901 North 5th Street, Kansas City, KS 66101  
Phone (913) 551-7324 Fax (913) 551-7063

[attachment "Final MDNR SFS comments.pdf" deleted by Gregory McCabe/R7/USEPA/US]